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2012 MAY 18 PM 3:09

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Attorneys for Plaintiff
WILLIAM TAYLOR

UNLIMITED JURISDICTION

SUPERIOR COURT OF THE STATE OF CALIFORNIA

FOR THE COUNTY OF LOS ANGELES

WILLIAM TAYLOR,

Plaintiff,

vs.

CITY OF BURBANK, ET AL.,

Defendants.

CASE NO. BC422252

[Assigned to the Hon. John L. Segal,
Judge, Dept. "50"]

OBJECTIONS TO ALLEGED
EVIDENCE SUBMITTED IN SUPPORT
OF MOTION FOR NEW TRIAL OR
ALTERNATIVE JNOV

Date: June 6, 2012

Time: 8:30 a.m.

Dept.: 50

Action Filed: 9/22/09

Trial: March 5, 2012


1 **TO THE COURT AND TO ALL PARTIES AND THEIR COUNSEL OF RECORD:**

2 **PLEASE TAKE NOTICE** that plaintiff William Taylor (hereafter "plaintiff") hereby presents
3 the following objections to the alleged evidence filed and/or lodged by defendant City of Burbank
4 ("defendant") in support of its Motion for New Trial or alternative JNOV.
5

6
7 Dated: May 17, 2012

LAW OFFICES OF GREGORY W. SMITH

8
9 By: _____


Gregory W. Smith
Christopher Brizzolara
Attorneys for Plaintiff
WILLIAM TAYLOR

I. OBJECTIONS TO DECLARATION OF CAROL H. AMBERG IN SUPPORT OF MOTION FOR NEW TRIAL

1. 1: 6 - 9 - objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: compound.

2. 1: 10 - 12 - objection: hearsay.

3. 1: 12 - 14 - objection: hearsay; objection: speculation; objection: vague and ambiguous; objection: best evidence rule.

4. 1: 14 - 17 - objection: hearsay.

5. 1: 17 - 19 - objection: hearsay.

6. 1: 20 - 22 - objection: hearsay.

7. 1: 22 - 23 - objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

8. 1: 23 - 26 - objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

9. 2: 1 - 2 - objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

10. 2: 2 - 3 - objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

11. 2: 3 - 4 - objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

12. 2: 4 - 5 - objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

13. 2: 5 - 7 - objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

14. 2: 7 - 8 - objection: lacks foundation and assumes facts not in evidence; objection:

1 speculation; objection: hearsay; objection: best evidence rule.

2 15. 2: 8 - 10 - objection: lacks foundation and assumes facts not in evidence; objection:
3 speculation; objection: hearsay; objection: best evidence rule.

4 16. 2: 11 - 13 - objection: lacks foundation and assumes facts not in evidence; objection:
5 speculation; objection: hearsay; objection: best evidence rule.

6 17. 2: 13 - 15 - objection: lacks foundation and assumes facts not in evidence; objection:
7 speculation; objection: hearsay; objection: best evidence rule.

8 18. 2: 15 - 16 - objection: lacks foundation and assumes facts not in evidence; objection:
9 speculation; objection: hearsay; objection: best evidence rule.

10 19. 2: 16 - 18 - objection: lacks foundation and assumes facts not in evidence; objection:
11 speculation; objection: hearsay; objection: best evidence rule.

12 20. 2: 18 - 19 - objection: lacks foundation and assumes facts not in evidence; objection:
13 speculation; objection: hearsay; objection: best evidence rule.

14 21. 2: 20 - 24 - objection: lacks foundation and assumes facts not in evidence; objection:
15 speculation; objection: hearsay; objection: best evidence rule.

16 22. 2: 26 - 28 - objection: lacks foundation and assumes facts not in evidence; objection:
17 speculation; objection: hearsay; objection: best evidence rule.

18 23. 3: 1 - 3 - objection: lacks foundation and assumes facts not in evidence; objection:
19 speculation; objection: hearsay; objection: best evidence rule.

20 24. 3: 4 - 6 - objection: lacks foundation and assumes facts not in evidence; objection:
21 speculation; objection: hearsay; objection: best evidence rule.

22 25. 3: 6 - 7 - objection: lacks foundation and assumes facts not in evidence; objection:
23 speculation; objection: hearsay; objection: best evidence rule.

24 26. 3: 7 - 8 - objection: lacks foundation and assumes facts not in evidence; objection:
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1 speculation; objection: hearsay; objection: best evidence rule.

2 27. 3: 8 - 9 - objection: lacks foundation and assumes facts not in evidence; objection:
3 speculation; objection: hearsay; objection: best evidence rule.

4 28. 3: 9 - 12 - objection: lacks foundation and assumes facts not in evidence; objection:
5 speculation; objection: hearsay; objection: best evidence rule.

6 29. 3: 13 - 15 - objection: lacks foundation and assumes facts not in evidence; objection:
7 speculation; objection: hearsay; objection: best evidence rule.

8 30. 3: 15 - 16 - objection: lacks foundation and assumes facts not in evidence; objection:
9 speculation; objection: hearsay; objection: best evidence rule.

10 31. 3: 16 - 19 - objection: lacks foundation and assumes facts not in evidence; objection:
11 speculation; objection: hearsay; objection: best evidence rule.

12 32. 3: 19 - 22 - objection: lacks foundation and assumes facts not in evidence; objection:
13 speculation; objection: hearsay; objection: best evidence rule.

14 33. 3: 22 - 23 - objection: lacks foundation and assumes facts not in evidence; objection:
15 speculation; objection: hearsay; objection: best evidence rule.

16 34. 3: 24 - 25 - objection: lacks foundation and assumes facts not in evidence; objection:
17 speculation; objection: hearsay; objection: best evidence rule.

18 35. 3: 25 - 28 - objection: lacks foundation and assumes facts not in evidence; objection:
19 speculation; objection: hearsay; objection: best evidence rule.

20 36. 3: 28 - 4: 2 - objection: lacks foundation and assumes facts not in evidence; objection:
21 speculation; objection: hearsay; objection: best evidence rule.

22 37. 4: 2 - 3 - objection: lacks foundation and assumes facts not in evidence; objection:
23 speculation; objection: hearsay; objection: best evidence rule.

24 38. 4: 4 - 5 - objection: lacks foundation and assumes facts not in evidence; objection:
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1 speculation; objection: hearsay; objection: best evidence rule.

2 39. 4: 5 - 7 - objection: lacks foundation and assumes facts not in evidence; objection:
3 speculation; objection: hearsay; objection: best evidence rule.

4 40. 4: 7 - 8 - objection: lacks foundation and assumes facts not in evidence; objection:
5 speculation; objection: hearsay; objection: best evidence rule.

6 41. 4: 9 - 10 - objection: lacks foundation and assumes facts not in evidence; objection:
7 speculation; objection: hearsay; objection: best evidence rule.

8 42. 4: 10 - 14 - objection: lacks foundation and assumes facts not in evidence; objection:
9 speculation; objection: hearsay; objection: best evidence rule.

10 43. 4: 14 - 15 - objection: lacks foundation and assumes facts not in evidence; objection:
11 speculation; objection: hearsay; objection: best evidence rule.

12 44. 4: 16 - 18 - objection: lacks foundation and assumes facts not in evidence; objection:
13 speculation; objection: hearsay; objection: best evidence rule.

14 45. 4: 18 - 21 - objection: lacks foundation and assumes facts not in evidence; objection:
15 speculation; objection: hearsay; objection: best evidence rule.

16 46. 4: 21 - 23 - objection: lacks foundation and assumes facts not in evidence; objection:
17 speculation; objection: hearsay; objection: best evidence rule.

18 47. 4: 24 - 26 - objection: lacks foundation and assumes facts not in evidence; objection:
19 speculation; objection: hearsay; objection: best evidence rule.

20 48. 4: 26 - 28 - objection: lacks foundation and assumes facts not in evidence; objection:
21 speculation; objection: hearsay; objection: best evidence rule.

22 49. 4: 28 - 5: 2 - objection: lacks foundation and assumes facts not in evidence; objection:
23 speculation; objection: hearsay; objection: best evidence rule.

24 50. 3: 2 - 4 - objection: lacks foundation and assumes facts not in evidence; objection:
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1 speculation; objection: hearsay; objection: best evidence rule.

2 51. 5: 4 - 8 - objection: lacks foundation and assumes facts not in evidence; objection:
3 speculation; objection: hearsay; objection: best evidence rule.

4 52. 5: 8 - 9 - objection: lacks foundation and assumes facts not in evidence; objection:
5 speculation; objection: hearsay; objection: best evidence rule.

6 53. 5: 10 - 14 - objection: lacks foundation and assumes facts not in evidence; objection:
7 speculation; objection: hearsay; objection: best evidence rule.

8 54. 5: 14 - 16 - objection: lacks foundation and assumes facts not in evidence; objection:
9 speculation; objection: hearsay; objection: best evidence rule.

10 55. 5: 16 - 17 - objection: lacks foundation and assumes facts not in evidence; objection:
11 speculation; objection: hearsay; objection: best evidence rule.

12 56. 5: 18 - 21 - objection: lacks foundation and assumes facts not in evidence; objection:
13 speculation; objection: hearsay; objection: best evidence rule.

14 57. 5: 21 - 24 - objection: lacks foundation and assumes facts not in evidence; objection:
15 speculation; objection: hearsay; objection: best evidence rule.

16 58. 5: 24 - 28 - objection: argumentative; objection: lacks foundation and assumes facts not
17 in evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

18 59. Exhibit 17 - objection: irrelevant; objection: lacks foundation and assumes facts not in
19 evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

20 60. Exhibit 18 - objection: irrelevant; objection: lacks foundation and assumes facts not in
21 evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

22 61. Exhibit 19 - objection: irrelevant; objection: lacks foundation and assumes facts not in
23 evidence; objection: speculation; objection: hearsay; objection: best evidence rule.

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II. OBJECTIONS TO DECLARATION OF RONALD F. FRANK IN SUPPORT OF MOTION FOR NEW TRIAL

1. 2: 1 - 3 - objection: irrelevant; objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: compound

2. 2: 6 - 7 - objection: irrelevant; objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: compound.

3. 2: 17 - 19 - objection: irrelevant; objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: compound.

4. 2: 19 - 21 - objection: speculation; objection: irrelevant; objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: compound.

5. 2: 21 - 23 - objection: speculation; objection: irrelevant; objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: best evidence rule.

6. 3: 2 - 4 - objection: speculation; objection: irrelevant; objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: best evidence rule.

7. 3: 4 - 7 - objection: speculation; objection: irrelevant; objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: best evidence rule.

8. 3: 13 - 16 - objection: argumentative; objection: speculation; objection: irrelevant; objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and ambiguous; objection: best evidence rule.

9. 3: 16 - 19 - objection: argumentative; objection: speculation; objection: irrelevant; objection:

1 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
2 ambiguous; objection: best evidence rule.

3 10. 3: 19 - 22 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
4 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
5 ambiguous; objection: best evidence rule.

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7 11. 3: 22 - 4: 2 - objection: argumentative; objection: speculation; objection: irrelevant;
8 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
9 vague and ambiguous; objection: best evidence rule.

10 12. 4: 2 - 5 - objection: argumentative; objection: irrelevant.

11 13. 4: 5 - 7 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
12 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
13 ambiguous; objection: best evidence rule.

14
15 14. 4: 7 - 9 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
16 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
17 ambiguous; objection: best evidence rule.

18 15. 4: 9 - 11 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
19 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
20 ambiguous; objection: best evidence rule.

21 16. 4: 11 - 14 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
22 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
23 ambiguous; objection: best evidence rule.

24
25 17. 4: 15 - 16 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
26 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
27 ambiguous; objection: best evidence rule.

1 18. 4: 16 - 19 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
2 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
3 ambiguous; objection: best evidence rule.

4 19. 4: 19 - 21 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
5 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
6 ambiguous; objection: best evidence rule.

7 20. 4: 21 - 22 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
8 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
9 ambiguous; objection: best evidence rule.

10 21. 4: 22 - 27 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
11 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
12 ambiguous; objection: best evidence rule.

13 22. 5: 4 - 9 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
14 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
15 ambiguous; objection: best evidence rule.

16 23. 5: 9 - 19 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
17 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
18 ambiguous; objection: best evidence rule.

19 24. 5: 19 - 23 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
20 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
21 ambiguous; objection: best evidence rule.

22 25. 5: 24 - 26 - objection: irrelevant; objection: lacks foundation and assumes facts not in
23 evidence.

24 26. 5: 26 - 6: 3 - objection: argumentative; objection: speculation; objection: irrelevant;
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1 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
2 vague and ambiguous; objection: best evidence rule.

3 27. 6: 4 - 7 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
4 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
5 ambiguous; objection: best evidence rule.

6 28. 6: 7 - 20 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
7 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
8 ambiguous; objection: best evidence rule.

9 29. 6: 20 - 23 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
10 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
11 ambiguous; objection: best evidence rule; objection: compound.

12 30. 6: 23 - 24 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
13 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
14 ambiguous; objection: best evidence rule; objection: compound.

15 31. 6: 24 - 28 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
16 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
17 ambiguous; objection: best evidence rule; objection: compound.

18 32. 7: 1 - 6 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
19 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
20 ambiguous; objection: best evidence rule; objection: compound.

21 33. 7: 7 - 11 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
22 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
23 ambiguous; objection: best evidence rule; objection: compound.

24 34. 7: 20 - 25 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
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1 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
2 ambiguous; objection: best evidence rule; objection: compound.

3 35. 8: 1 - 5 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
4 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
5 ambiguous; objection: best evidence rule; objection: compound.

6 36. 8: 6 - 7 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
7 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
8 ambiguous; objection: best evidence rule; objection: compound.

9 37. 8: 7 - 10 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
10 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
11 ambiguous; objection: best evidence rule; objection: compound.

12 38. 8: 10 - 12 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
13 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
14 ambiguous; objection: best evidence rule; objection: compound.

15 39. 8: 12 - 14 - objection: argumentative; objection: irrelevant.

16 40. 8: 16 - 18 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
17 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
18 ambiguous; objection: best evidence rule; objection: compound.

19 41. 8: 23 - 9: 2 - objection: argumentative; objection: speculation; objection: irrelevant;
20 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
21 vague and ambiguous; objection: best evidence rule; objection: compound.

22 42. 9: 2 - 4 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
23 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
24 ambiguous; objection: best evidence rule; objection: compound.

1 43. 9: 4 - 6 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
2 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
3 ambiguous; objection: best evidence rule; objection: compound.

4 44. 9: 7 - 9 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
5 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
6 ambiguous; objection: best evidence rule; objection: compound.

7 45. 9: 9 - 12 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
8 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
9 ambiguous; objection: best evidence rule; objection: compound.

10 46. 9: 12 - 14 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
11 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
12 ambiguous; objection: best evidence rule; objection: compound.

13 47. 9: 15 - 18 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
14 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
15 ambiguous; objection: best evidence rule; objection: compound.

16 48. 9: 19 - 26 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
17 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
18 ambiguous; objection: best evidence rule; objection: compound.

19 49. 9: 27 - 10: 2 - objection: argumentative; objection: speculation; objection: irrelevant;
20 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
21 vague and ambiguous; objection: best evidence rule; objection: compound.

22 50. 10: 3 - 10 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
23 hearsay; objection: lacks foundation and assumes facts not in evidence; objection: vague and
24 ambiguous; objection: best evidence rule; objection: compound.

1 51. 10: 11 - 15 - objection: argumentative; objection: speculation; objection: irrelevant;
2 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
3 vague and ambiguous; objection: best evidence rule; objection: compound.

4 52. 10: 16 - 18 - objection: argumentative; objection: speculation; objection: irrelevant;
5 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
6 vague and ambiguous; objection: best evidence rule; objection: compound.

7 53. 10: 18 - 21 - objection: argumentative; objection: speculation; objection: irrelevant;
8 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
9 vague and ambiguous; objection: best evidence rule; objection: compound.

10 54. 10: 21 - 24 - objection: argumentative; objection: speculation; objection: irrelevant;
11 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
12 vague and ambiguous; objection: best evidence rule; objection: compound.

13 55. 10: 25 - 27 - objection: argumentative; objection: speculation; objection: irrelevant;
14 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
15 vague and ambiguous; objection: best evidence rule; objection: compound.

16 56. 10: 27 - 11: 1 - objection: argumentative; objection: speculation; objection: irrelevant;
17 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
18 vague and ambiguous; objection: best evidence rule; objection: compound.

19 57. 11: 1 - 6 - objection: argumentative; objection: speculation; objection: irrelevant;
20 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
21 vague and ambiguous; objection: best evidence rule; objection: compound.

22 58. 11: 7 - 10 - objection: argumentative; objection: speculation; objection: irrelevant;
23 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
24 vague and ambiguous; objection: best evidence rule; objection: compound.

59. 11: 14 - 16 - objection: argumentative; objection: speculation; objection: irrelevant;
objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
vague and ambiguous; objection: best evidence rule; objection: compound.

60. 11: 16 - 20 - objection: argumentative; objection: speculation; objection: irrelevant;
objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
vague and ambiguous; objection: best evidence rule; objection: compound.

61. 11: 20 - 21 - objection: argumentative; objection: speculation; objection: irrelevant;
objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
vague and ambiguous; objection: best evidence rule; objection: compound.

62. 11: 22 - 23 - objection: argumentative; objection: speculation; objection: irrelevant;
objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
vague and ambiguous; objection: best evidence rule; objection: compound.

63. 11: 23 - 26 - objection: argumentative; objection: speculation; objection: irrelevant;
objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
vague and ambiguous; objection: best evidence rule; objection: compound.

64. 11: 26 - 28 - objection: argumentative; objection: speculation; objection: irrelevant;
objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
vague and ambiguous; objection: best evidence rule; objection: compound.

65. 11: 28 - 12: 2 - objection: argumentative; objection: speculation; objection: irrelevant;
objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
vague and ambiguous; objection: best evidence rule; objection: compound.

66. 12: 2 - 5 - objection: argumentative; objection: speculation; objection: irrelevant;
objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
vague and ambiguous; objection: best evidence rule; objection: compound.

1 75. 13: 27 - 14: 3 - objection: argumentative; objection: speculation; objection: irrelevant;
2 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
3 vague and ambiguous; objection: best evidence rule; objection: compound.

4 76. 14: 4 - 8 - objection: argumentative; objection: speculation; objection: irrelevant;
5 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
6 vague and ambiguous; objection: best evidence rule; objection: compound.

7 77. 14: 9 - 13 - objection: argumentative; objection: speculation; objection: irrelevant;
8 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
9 vague and ambiguous; objection: best evidence rule; objection: compound.

10 78. 14: 14 - 18 - objection: argumentative; objection: speculation; objection: irrelevant;
11 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
12 vague and ambiguous; objection: best evidence rule; objection: compound.

13 79. 14: 19 - 22 - objection: argumentative; objection: speculation; objection: irrelevant;
14 objection: hearsay; objection: lacks foundation and assumes facts not in evidence; objection:
15 vague and ambiguous; objection: best evidence rule; objection: compound.

16 80. Exhibit 3 - objection: irrelevant; objection: hearsay; objection: lacks foundation and
17 assumes facts not in evidence; objection: best evidence rule.

18 **III. OBJECTIONS TO DECLARATION OF LINDA MILLER SAVITT IN SUPPORT OF**
19 **MOTION FOR NEW TRIAL**

20 1. 1: 14 - 16 - objection: irrelevant; objection: hearsay; objection: lacks foundation and
21 assumes facts not in evidence; objection: vague and ambiguous; objection: compound.

22 2. 1: 16 - 19 - objection: lacks foundation and assumes facts not in evidence; objection:
23 speculation; objection: hearsay; objection: best evidence rule; objection: compound.

24 3. 1: 19 - 22 - objection: lacks foundation and assumes facts not in evidence; objection:
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speculation; objection: hearsay; objection: best evidence rule; objection: compound.

4. 1: 22 - 25 - objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: argumentative; objection: hearsay; objection: best evidence rule.

5. 1: 24 - 26 - objection: irrelevant; objection: argumentative.

6. 1: 25 - 28 - objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: argumentative; objection: hearsay; objection: best evidence rule.

7. 1: 28 - 2: 2 - objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: speculation; objection: argumentative; objection: hearsay; objection: best evidence rule.

8. 2: 2 - 3 - objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: argumentative; objection: hearsay; objection: best evidence rule.

9. 2: 3 - 5 - objection: irrelevant.

10. 2: 3 - objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: hearsay; objection: best evidence rule.

11. 2: 6 - 8 - objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: hearsay; objection: best evidence rule.

12. 2: 8 - 10 - objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: hearsay; objection: best evidence rule.

13. 2: 10 - 11 - objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: hearsay; objection: best evidence rule.

14. 2: 11 - 14 - objection: speculation; objection: irrelevant; objection: lacks foundation and assumes facts not in evidence; objection: hearsay; objection: best evidence rule.

15. 2: 15 - 17 - objection: speculation; objection: irrelevant; objection: lacks foundation and

1 assumes facts not in evidence; objection: hearsay; objection: best evidence rule.

2 16. 2: 17 - 20 - objection: argumentative; objection: speculation; objection: irrelevant; objection:
3 lacks foundation and assumes facts not in evidence; objection: hearsay; objection: best evidence
4 rule.

5 17. 2: 20 - 22 - objection: irrelevant; objection: lacks foundation and assumes facts not in
6 evidence; objection: hearsay; objection: best evidence.
7

8
9 Dated: May 17, 2012

LAW OFFICES OF GREGORY W. SMITH

10
11 By: _____


Gregory W. Smith
Christopher Brizzolara
Attorneys for Plaintiff
WILLIAM TAYLOR

PROOF OF SERVICE

STATE OF CALIFORNIA)
)
COUNTY OF LOS ANGELES)

I am employed in the County of Los Angeles, State of California. I am over the age of 18 years of age, and am not a party to the within action; my business address is 9100 Wilshire Boulevard, Suite 345E, Beverly Hills, California 90212.

On the date hereinbelow specified, I served the foregoing document, described as set forth below on the interested parties in this action by placing true copies thereof enclosed in sealed envelopes, at Beverly Hills, addressed as follows:

DATE OF SERVICE : May 17, 2012

DOCUMENT SERVED : **OBJECTIONS TO ALLEGED EVIDENCE SUBMITTED IN SUPPORT OF MOTION FOR NEW TRIAL OR ALTERNATIVE JNOV**

PARTIES SERVED : **SEE ATTACHED SERVICE LIST.**

XXX (BY FEDERAL EXPRESS) I caused the aforesaid document(s) to be delivered to Federal Express either by an authorized courier of Federal Express or by delivery to an authorized Federal Express office in a pre-paid envelope for overnight delivery to the addressee(s) as shown on the Service List.

XXX (BY ELECTRONIC MAIL) I caused such document to be electronically mailed to **Christopher Brizzolara, Esq.** at the following e-mail address: samorai@adelphia.net.

XXX (STATE) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

— (FEDERAL) I declare that I am employed in the office of a member of the bar of this court at whose direction the service was made.

EXECUTED at Beverly Hills, California on May 17, 2012.

Selma I. Francia

SERVICE LIST

WILLIAM TAYLOR v. CITY OF BURBANK
LOS ANGELES COUNTY SUPERIOR COURT CASE NO. BC 422 252

Christopher Brizzolara, Esq.
1528 16th Street
Santa Monica, California 90404
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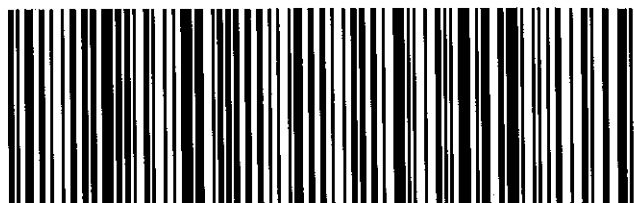
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